

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-293-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD;	)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,	)	
INC.; SAMSUNG SEMICONDUCTOR	)	<div style="background-color: black; width: 150px; height: 1.2em;"></div>
INC.,	)	
	)	
Defendants.	)	

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NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-294-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;	)	
MICRON SEMICONDUCTOR	)	
PRODUCTS, INC.; MICRON	)	
TECHNOLOGY TEXAS LLC,	)	
	)	
Defendants.	)	

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**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST, INC.'S  
OPPOSITION TO SAMSUNG'S DAUBERT MOTION TO STRIKE EXPERT  
TESTIMONY OF DR. MANGIONE-SMITH**

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Opposition to Samsung’s *Daubert* Motion to Strike Expert Testimony of Dr. Mangione-Smith. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of the Netlist’s DDR4 Exemplary Claim Chart for US Patent No. 7,619,912.

3. Attached as **Exhibit 2** is a true and correct true and correct copy of Attachment B to the Rebuttal Expert Report of Dr. Mangione-Smith.

4. Attached as **Exhibit 3** is a true and correct copy of the transcript of the November 10, 2023 deposition of Sungyub Jang.

5. Attached as **Exhibit 4** is a true and correct copy of Exhibit B to Samsung’s November 10, 2023 Supplemental Interrogatory Responses.

6. Attached as **Exhibit 5** is a true and correct copy of Ex. B to Netlist’s preliminary infringement contentions.

7. Attached as **Exhibit 6** is a true and correct copy of Ex. D to Netlist’s Second Supplemental Preliminary Infringement Contentions, served on Samsung on February 7, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of JEDEC Standard JESD82-32A produced at SAM-NET00332666.

9. Attached as **Exhibit 8** is a true and correct true and correct copy of Exhibit D to the Opening Expert Report of Dr. Mangione-Smith.

10. Attached as **Exhibit 9** is a true and correct true and correct copy of Attachment A to

the Rebuttal Expert Report of Mr. Joseph C. McAlexander III.

11. Attached as **Exhibit 10** is a true and correct true and correct copy of Attachment B to the Rebuttal Expert Report of Mr. Joseph C. McAlexander III.

12. Attached as **Exhibit 11** is a true and correct true and correct copy of Attachment C to the Rebuttal Expert Report of Mr. Joseph C. McAlexander III.

13. Attached as **Exhibit 12** is a true and correct copy of Netlist's preliminary infringement contentions served on November 17, 2022.

14. Attached as **Exhibit 13** is a true and correct copy of the transcript of the September 8, 2022 deposition of Seung-Mo Jung in connection with Case No. 2:21-cv-463.

15. Attached as **Exhibit 14** is a true and correct copy of the transcript of the January 12, 2024 deposition of Dr. Mangione-Smith.

16. Attached as **Exhibit 15** is a true and correct copy of Netlist's Revised Fourth Amended and Supplemental Responses and Objections to Samsung's Second Set of Interrogatories dated November 19, 2023.

17. Attached as **Exhibit 16** is a true and correct copy of the November 21, 2023 Opening Expert Report of Mr. David Kennedy

18. Attached as **Exhibit 17** is a true and correct true and correct copy of Exhibit I to the Opening Expert Report of Dr. Mangione-Smith.

19. Attached as **Exhibit 18** is a true and correct true and correct copy of the Patent Owner Response filed in IPR2022-00615.

20. Attached as **Exhibit 19** is a true and correct true and correct copy of the Declaration of Steven Przybylski, Ph.D, filed in IPR2023-00454.

21. Attached as **Exhibit 20** is a true and correct true and correct copy of the Report and Recommendation of the Special Master filed under seal in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 30, 2024.

By /s/ Jason G. Sheasby

Jason G. Sheasby